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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 **TEAMLAB, INC.**, a Japanese corporation,

17 Plaintiff,

18 v.

19 **ARTE MUSEUM LV, LLC**, a Delaware  
20 limited liability company; **D'STRICT  
HOLDINGS INC.**, a Delaware corporation,  
21 and **D'STRICT KOREA INC.**, a Korean  
Corporation,

22 Defendants.

23 CASE NO. 2:23-cv-01956-JAD-DJA

24  
25 **STIPULATION AND PROPOSED  
ORDER TO WAIVE SERVICE ON  
FOREIGN DEFENDANT AND  
EXTEND TIME TO RESPOND TO  
COMPLAINT  
(FIRST REQUEST)**

26 Plaintiff TEAMLAB, INC., a Japanese corporation, and Defendants ARTE  
MUSEUM LV, LLC, a Delaware limited liability company, D'STRICT HOLDINGS INC.,  
a Delaware corporation, and D'STRICT KOREA INC., a Korean Corporation (collectively,

27 // /

1 “Defendants”), by and through their respective counsel, and pursuant to Local Rules IA 6-  
 2 LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

3 WHEREAS, Plaintiff served Defendant Arte Museum LV on November 27, 2023,  
 4 and its deadline to respond to the complaint is currently December 18, 2023;

5 WHEREAS, Plaintiff served Defendant D’strict Holdings on November 28, 2023,  
 6 and its deadline to respond to the complaint is currently December 19, 2023;

7 WHEREAS, Defendant D’strict Korea, a Korean company, has not yet been served;

8 WHEREAS, D’strict Korea has agreed to waive service under the Hague  
 9 Convention<sup>1</sup>;

10 WHEREAS, D’strict Korea, as a foreign entity, would normally have ninety days to  
 11 respond to a complaint after the waiver-of-service request was sent to it, *see* Fed. R. Civ.  
 12 P. 4(d)(3);

13 WHEREAS, the waiver-of-service request was sent to D’strict Korea on  
 14 December 15, 2023, and its deadline to respond is therefore currently March 14, 2024;

15 WHEREAS, D’strict Korea has agreed to shorten its response deadline to March 4,  
 16 2024 provided that D’strict Holdings and Arte Museum LV would likewise respond by  
 17 March 4, 2024. Plaintiff is agreeable to this schedule;

18 WHEREAS, aligning Defendants’ response deadlines will ensure consistency and  
 19 efficiency and will shorten the pleading stage for this proceeding;

20 WHEREAS, additionally, counsel for Defendants was just retained on December 13,  
 21 and an extension of time to respond will permit Defendants to more fully evaluate and  
 22 respond to the complaint, especially given limited availability during the holiday season and  
 23 coordination with party representatives overseas;

24 WHEREAS, the Court has not entered a Case Management and Scheduling Order,  
 25 and consequently there are no deadlines set in this case that will be affected by the proposed  
 26 reasonable extension sought in this stipulation;

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 28 <sup>1</sup> D’strict Korea reserves all rights and defenses, including as to jurisdiction and venue, but waives  
 any objection to the absence of a summons or of service.

1 NOW, THEREFORE, in consideration of the foregoing, the parties hereby  
2 STIPULATE and AGREE that the deadline for each Defendant to respond to the complaint  
3 is March 4, 2024.

4 The parties represent this stipulation is made in good faith and not for the purposes  
5 of delay. This is the first request to extend time to respond to the complaint.

6 **IT IS SO STIPULATED.**

7 Dated this 15<sup>th</sup> day of December, 2023.

8 GREENBERG TRAURIG, LLP

9 /s/ Bethany L. Rabe  
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Dated this 15<sup>th</sup> day of December, 2023.

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14  
15 **IT IS SO ORDERED.**

16   
17 DANIEL J. ALBREGTS  
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: December 18, 2023